

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LIGHTHOUSE FINANCIAL GROUP, Individually and on Behalf of All Others Similarly Situated,	x 11 Civ. 398 (GBD)
	:
	:
Plaintiff,	ECF Case
	:
vs.	Oral Argument Requested
	:
THE ROYAL BANK OF SCOTLAND GROUP, PLC, et al.,	:
	:
Defendants.	:
	:
	:
	x

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**CHARLES KOCH'S JOINDER IN THE ROYAL BANK OF SCOTLAND GROUP PLC'S  
AND THE INDIVIDUAL DEFENDANTS' MOTIONS TO DISMISS  
THE CONSOLIDATED AMENDED COMPLAINT**

Charles Koch hereby joins and incorporates by reference the motions to dismiss and accompanying memoranda of law and declarations in support thereof filed by The Royal Bank of Scotland Group plc ("RBS") and five Individual Defendants on January 13, 2012. [Dkt. Nos. 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87.]

Although the November 1, 2011 Consolidated Amended Complaint ("CAC") [Dkt. No. 71] purported to name Charles Koch as a defendant for an alleged violation of Section 11 of the Securities Act of 1933, 15 U.S.C. §§ 77(a)(2) & 77k, at the time RBS and the five Individual Defendants moved to dismiss the CAC, Mr. Koch had not been served with a summons or complaint in this action. Plaintiffs subsequently served Mr. Koch on January 30, 2012. (See Affirmation of Service [Dkt. No. 91].)

For the reasons set forth in RBS's and the five Individual Defendants' motions to dismiss and accompanying memoranda of law and declarations in support thereof, the claim against Charles Koch should be dismissed with prejudice.

Dated: February 21, 2012

Respectfully submitted,

/s/ David S. Lesser  
David S. Lesser  
Robert W. Trenchard  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
399 Park Avenue  
New York, New York 10022  
Telephone: 212-230-8800  
Fax: 212-230-8888

Andrea J. Robinson  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, Massachusetts 02109  
Telephone: 617-526-6000  
Fax: 617-526-5000

*Counsel for defendant Charles Koch*